

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re	:	
	:	Chapter 7
IVAN JEFFERY,	:	
	:	Case No. 16-15037 (REF)
Debtor.	:	
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ARTESANIAS HACIENDA REAL S.A. de C.V.,	:	
Plaintiff,	:	
v.	:	Adv. Proc. No. 17-00028 (JKF)
IVAN JEFFERY,	:	
Defendant.	:	

**DEFENDANT IVAN L. JEFFERY'S PRETRIAL DISCLOSURES
PURSUANT TO F.R.B.P. 7026 and FED.R.CIV.P. 26(a)(3)**

And now comes the Defendant, Ivan Jeffery, by and through his counsel, Charles J. Phillips, Esquire, Eden R. Bucher, Esquire, and Leisawitz Heller Abramowitch Phillips P.C., and pursuant to Rule 7026 of the Federal Rules of Bankruptcy Procedure and Rule 26(a)(3) of the Federal Rules of Civil Procedure, hereby makes his Pretrial Disclosures as follows:

INTRODUCTORY STATEMENT

The following Disclosures are made based on the information reasonably available to the Defendant as of February 4, 2019. By making these Disclosures, the Defendant does not represent that he is identifying every exhibit or witness possibly relevant to this lawsuit. The Defendant's Disclosures represent a good faith effort to identify the witnesses and exhibits that he may use in the upcoming trial. All of the Disclosures below are made subject to the above qualifications.

DISCLOSURES

A. WITNESSES

1. Ivan Jeffery
42584 Maggie Jones Road
Paisley, FL 32767
2. Wilhelmina Jeffery
42584 Maggie Jones Road
Paisley, FL 32767

3. Ernesto Martin del Campo
c/o Barry L. Goldin, Esquire
3744 Barrington Drive
Allentown, PA 18104-1759

4. Michael S. Yayac
Strategic Resources, Inc.
1869 Charter Lane
Lancaster, PA 17601

B. DESIGNATION OF WITNESSES WHOSE TESTIMONY IS EXPECTED TO BE PRESENTED BY MEANS OF A DEPOSITION.

None.

C. IDENTIFICATION OF EACH DOCUMENT OR OTHER EXHIBIT WHICH THE DEFENDANT EXPECTS TO OFFER OR MAY OFFER.

Pursuant to Rule 26(a)(3)(C) of the Federal Rules of Civil Procedure, applicable to bankruptcy by Rule 7026 of the Federal Rules of Bankruptcy Procedure, the Defendant hereby provides the list of exhibits that will be offered and the exhibits that may be offered if the need arises.

1. Defendant's original Schedule A/B filed on July 15, 2016, the amended Schedule A/B filed on August 9, 2016, and the amended Schedule A/B filed on August 29, 2016;
2. Defendant's Schedules F from his 2014 and 2015 Federal Income Tax Returns;
3. The Wilhelmina S. Jeffery Revocable Trust created on February 1, 2008;
4. Emails between the Defendant and his counsel regarding the formation of the Trust which have been provided to the Plaintiff's counsel during the discovery in this matter;
5. Defendant's Statement of Financial Affairs filed on July 15, 2016; and
6. Junior Participation Agreement entered into on April 20, 2015 between Defendant and North Mill Capital and the First Amendment to Junior Participation Agreement.

D. RESERVATION OF RIGHT TO SUPPLEMENT.

The Defendant is continuing his investigation with respect to all of the claims and defenses in this action. The Defendant, therefore, specifically reserves the right to supplement these Disclosures as necessary.

Respectfully submitted,

LEISAWITZ HELLER ABRAMOWITCH PHILLIPS, P.C.

Date: February 4, 2019

By: /s/ Charles J. Phillips
Charles J. Phillips, Esquire
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